# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA AT ELKINS

FRIEDRICHS HARRIS, ADMINISTRATOR OF THE ESTATE OF EVAN M. HARRIS,

Plaintiff,

٧.

**CIVIL ACTION NO.: 2:16-cv-00046** 

JUDGE BAILEY

Q&A ASSOCIATES, INC., ANGELA SHOCKLEY, KEITH BISHOP, MATTHEW SHOCKLEY, SANDY SCHMIEDEKNECHT, and TAMMY ROBBINS.

Defendants.

DEFENDANTS Q & A ASSOCIATES, INC., ANGELA SHOCKLEY, KEITH BISHOP, MATTHEW SHOCKLEY, SANDY SCHMIEDEKNECHT, and TAMMY ROBBINS' MOTION TO COMPEL ARBITRATION AND STAY PROCEEDINGS

COME NOW, Defendants, Q & A Associates, Inc., Angela Shockley, Keith Bishop, Matthew Shockley, Sandy Schmiedeknecht, and Tammy Robbins (hereinafter "Defendants"), by counsel, Thomas V. Flaherty, Lindsey M. Saad, Christopher M. Jones, and Flaherty Sensabaugh Bonasso, PLLC, and pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 et seq. (the "FAA"), move for an Order: (1) compelling Plaintiff to arbitrate his claims in this suit; and (2) staying the instant action pending the outcome of the arbitration proceedings. In support of their Motion, the Defendants offer their Memorandum of Law in Support of Defendants Q & A Associates, Inc., Angela Shockley, Keith Bishop, Matthew Shockley, Sandy Schmiedeknecht, and Tammy Robbins' Motion To Compel Arbitration and Stay Proceedings.

Q & A ASSOCIATES, INC., ANGELA SHOCKLEY, KEITH BISHOP, MATTHEW SHOCKLEY, SANDY SCHMIEDEKNECHT, and TAMMY ROBBINS,

## DEFENDANTS BY COUNSEL,

### /s/ Christopher M. Jones

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#### and

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# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA AT ELKINS

FRIEDRICHS HARRIS, ADMINISTRATOR OF THE ESTATE OF EVAN M. HARRIS,

Plaintiff,

v. CIVIL ACTION NO.: 2:16-cv-00046

JUDGE BAILEY

Q&A ASSOCIATES, INC., A WEST VIRGINIA CORPORATION, ANGELA SHOCKLEY, KEITH BISHOP, MATTHEW SHOCKLEY, AND SANDY SCHMIEDEKNECHT, and TAMMY ROBBINS.

Defendants.

### **CERTIFICATE OF SERVICE**

I certify that on this 4th day of November, 2016, I filed electronically via CM/ECF a true copy of "DEFENDANTS Q & A ASSOCIATES, INC., ANGELA SHOCKLEY, KEITH BISHOP, MATTHEW SHOCKLEY, SANDY SCHMIEDEKNECHT, and TAMMY ROBBINS' MOTION TO COMPEL ARBITRATION" with notice of the same being electronically served by the Court, addressed to the following:

David A. Sims, Esq. Law Offices of David A. Sims, PLLC P.O. Box 5349 Vienna, WV 26105

/s/ Christopher M. Jones

Lindsey M. Saad (WV Bar No. 11155) Christopher M. Jones (WV Bar No. 11689)